Thank you for the opportunity to comment. In regards to the note under 1) Definitions, A. Exit Sign, which states in part:

"...for EPA to accurately assess the energy efficiency of any model, it is necessary to consider an exit sign along with the input power demand of its illuminating light source. *Therefore, under this specification, a photoluminescent exit sign model may pursue ENERGY STAR qualification only if it can be evaluated with the specific charging light source marked on the face of the sign, per the marking instructions in the UL 924 Standard for Emergency Lighting and Power Equipment. EPA welcomes manufacturer input on the feasibility of evaluating photoluminescent signs with this method."*

"If a separate charging light source must be installed to properly illuminate a photoluminescent exit sign, for example, that sign has not contributed to the overall energy efficiency of the building. EPA would be remiss to allow the label on these signs without considering the power consumption of the light source required to provide the necessary illumination. EPA is not satisfied that ambient light in buildings is always sufficient to charge photoluminescent exit signs. For this reason, it is necessary for EPA to consider the input power demand of the charging light source when determining the energy efficiency of a photoluminescent exit sign."

EPA has evidently been given erroneous information regarding the installation and use of photoluminescent exit signs. It is simply not cost-effective, nor the practice, to install a separate charging light source for photoluminescent exit signs. I am not aware of any installations in the United States where a separate charging light source has been installed specifically for a photoluminescent exit sign.

Photoluminescent exit signs are designed to be used with ambient light. That's the main advantage of using this type of sign. It uses no electrical energy other than what is already provided by ambient lighting, and it is capable of remaining visible for a minimum of 90 minutes independent of any electricity, batteries or generators.

Normal lighting is defined by Underwriters Laboratory as 50 foot-candles. By contrast, Photoluminescent exit signs are only required to have a minimum of 5 foot candles of external illumination. The majority of buildings have sufficient ambient light to provide 5 foot candles. If EPA has been given information to the contrary, we strongly suspect it is coming from industry competitors.

If EPA is still concerned that, notwithstanding normal practice to use ambient light, it may still be possible to install a photoluminescent exit sign with a separate charging light, regardless of whether it is cost-effective or not, EPA can easily state that an energy star rating for a photoluminescent exit sign is only valid when an ambient light source is used.

Thank you for your consideration.

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